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Attorneys for Defendant Stephen Silverman

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,)	CASE NO.: CR 18-533 RS
)	
Plaintiff,)	[PROPOSED] STIPULATION RE:
)	INTERNATIONAL TRAVEL
vs.)	
)	
STEPHEN SILVERMAN, ET AL.,)	
)	
Defendants.)	
)	
)	
)	

It is hereby Stipulated between Plaintiff United States of America, by and through its counsel, AUSA Andrew Dawson, and Defendant Stephen Silverman, by and through his counsel, Philip Cohen, that Defendant, upon the posting of a \$250,000 cash bond by proposed surety Julie Milligan, be permitted to travel from the Central District of California to Toronto, Canada, departing November 18, 2019, and returning no later than November 25, 2019, inclusive.

In conjunction herewith, it is further Stipulated that the Clerk of the Court and/or Pre-Trial Services, upon proof of the aforementioned cash bond having been posted, be ordered to release Defendant's passport to his possession for purposes of

1 travel to Canada. Defendant shall return his passport to the possession of the Clerk of
2 the Court and/or Pre-Trial Services, within 48 hours of his return to the Central District
3 of California.

4 Good cause exists for the proposed Stipulation in that Defendant is a practicing
5 California-licensed attorney who maintains and services clients based both inside and
6 outside of the United States. Defendant's instant travel is for the purpose of client
7 meetings. Defendant's Pre-Trial Services Officer, Alexis Ochoa, has no objection to
8 the instant request.

9 All other conditions of Pre-Trial Release shall remain in full force and effect.

10 IT IS SO STIPULATED.

11
12 Dated: November 12, 2019 By: _____//pkc//_____
13 Philip Kent Cohen
14 Attorney for Defendant Stephen Silverman

15 Dated: November 12, 2019 DAVID L. ANDERSON
16 United States Attorney
17 By: _____//ad//_____
18 AUSA Andrew Dawson
19 Attorneys for Plaintiff United States of America
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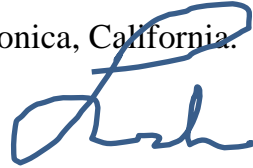
CERTIFICATE OF SERVICE - CM/ECF

I, **LESLIE MAYTORENA**, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to this action. My business address is 100 Wilshire Boulevard, Suite 1300, Santa Monica, California 90401-1142, (310) 899-3300.

On **November 12, 2019**, I served the document(s) described as [**PROPOSED**] **STIPULATION RE: INTERNATIONAL TRAVEL** on the interested parties in this action by electronically filling the foregoing with the Clerk of the Court by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Executed on **November 12, 2019**, at Santa Monica, California.



LESLIE MAYTORENA